

REMARKS

The application is amended to place the application in condition for allowance at the time of the next Official Action.

Replacement drawings are submitted for Figures 8a, 8b and 8c, labeling these figures as PRIOR ART, consistent with the disclosure on page 5, line 24, through page 6, line 2 of the application as filed. The above-noted changes are the only changes and are believed not to introduce new matter.

Claims 1-16 are pending in the application.

Claims 1-16 were rejected as unpatentable over RIVARD (PG Pub# US 2004/0078508) in view of WEBER 5,596,708. That rejection is respectfully traversed.

Independent claims 1, 7, and 11 are amended and recite substantially simultaneously writing data and check information to first and second disks.

By way of example, Figure 6 and page 16, line 12, to page 18, line 1, and page 19, line 23 to page 20, line 9, disclose that data in a cache memory and check information generated based on that data are written to first and second disks. In order to maintain data coherency of the write data and check information, the write data and the check information are written into the disks substantially simultaneously. See, for example, Step S28 of Figure 6.

Neither RIVARD nor WEBER disclose or suggest this feature.

RIVARD in paragraphs 47 discloses that Cache Access Concentrator 201 has one or more high speed, preferably serial interfaces 220 for the purpose of accessing disk storage through a Write Cache Controller (WCC) 205, 213. Each WCC 205, 213 has one or more disks facing interfaces 206, 219.

Paragraph 49 of RIVARD further discloses that each WCC module 205, 213 operates autonomously with respect to each other WCC module. Since data is written to each disk autonomously, the data and check information cannot be written substantially simultaneously to first and second disks.

Col. 8, lines 27-51 of WEBER disclose that separating DRIVE B (data drive) and DRIVE A (parity drive) read and write operations allows for more efficient utilization of the disk drives. As WEBER discloses that data and parity are written separately to DRIVE B and DRIVE A, the data and parity information are not written substantially simultaneously to the first and second disks, as recited.

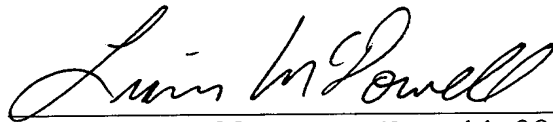
The above-noted feature is missing from each of the references, is absent from the combination and thus would not have been obvious to one having ordinary skill in the art.

In view of the present amendment and the foregoing remarks, it is believed that the present application has been placed in condition for allowance. Reconsideration and allowance are respectfully requested.

The Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 25-0120 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17.

Respectfully submitted,

YOUNG & THOMPSON

A handwritten signature in cursive script, reading "Liam McDowell", written in dark ink.

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**APPENDIX:**

The Appendix includes the following item(s):

- a Replacement Sheet for Figures 8a, 8b and 8c of the drawings